

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio



In the Matter of the Search of _____
 (Briefly describe the property to be searched or identify the person by name and address) _____
 Priority Mail Tracking Number _____
 9405 5368 9523 2358 3765 91 _____
 postmarked September 14, 2021 _____
)
)
)
 Case No. **1:21-MJ-00674**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Package 9405536895232358376591 addressed to Cameron Moore, 5262 Brown Rd Apt 1041, Oxford, OH 45056-9818, with a return address of Bird Rock Coffee Roasters, 5627 La Jolla Blvd, La Jolla, CA 92037 located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

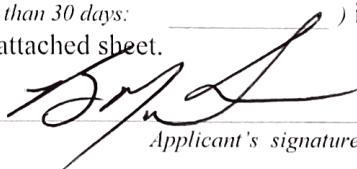
The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841(a)(1)	Distribution and possession with intent to distribute a controlled substance.
21 USC 846	Conspiracy to distribute/possess with intent to distribute a controlled substance
21 USC 843(b)	Use of a communication facility to commit a felony

The application is based on these facts:
 SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Brad M. Dorman, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

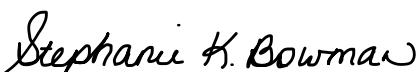
FaceTime Video

(specify reliable electronic means).

Date:

Sep 16, 2021

City and state: Cincinnati, Ohio



Judge's signature

Stephanie K. Bowman, United States Magistrate Judge

Printed name and title



AFFIDAVIT

I, Brad M. Dorman, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since August 17, 2017. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (“USPIS”) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. I completed United States Postal Inspection Service Basic Training in November 2017. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, I have worked since November 2017 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely the package associated with the following United States Postal Service (“USPS”) Priority Mail, Tracking Number:
 - a. **9405 5368 9523 2358 3765 91** (the “**Subject Package**”)

This Affidavit is made in support of a warrant to search the **Subject Package** for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the **Subject Package**, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the **Subject Package**. The **Subject Package** is currently being held at the United States Post Office in Oxford, OH.

4. Based on my training and experience, I have become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, I have learned of certain characteristics associated with other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include (but are not necessarily limited to or used on every occasion): false or non-existent return address, addressee is not known to receive mail at

the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about September 16, 2021, The **Subject Package** was identified and intercepted at the Leasing Office of Hawks Landing Apartments, 5262 Brown Road, Oxford, OH 45056.

The **Subject Package** is further described as:

Priority Mail, Tracking Number: 9405 5368 9523 2358 3765 91
Weighing approximately 3 pounds and 10 ounces and postage paid was \$6.68.

Sender: BIRD ROCK COFFEE ROASTERS
5627 LA JOLLA BLVD
LA JOLLA, CA 92037

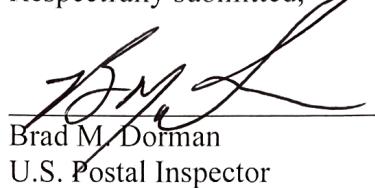
Addressee: CAMERON MOORE
5262 BROWN RD APT 1041
OXFORD OH 45056-9818

8. I observed the **Subject Package** and reviewed USPS tracking information, which indicated it was mailed from the Pacific Beach Post Office, San Diego, CA 92109 on September 14, 2021.
9. I searched the CLEAR database for the listed return address of the **Subject Package**. CLEAR is an investigative platform available exclusively to law enforcement and other government investigators that contains public-record data about people and businesses. The information obtained from the system indicated that there is a BIRD ROCK COFFEE ROASTERS associated with that address.
10. I searched the CLEAR database for the listed addressee of the **Subject Package**. The information obtained from the system indicated that there is no CAMERON MOORE associated with that address.
11. On or about September 16, 2021, I arranged for Deputy Rhoades, Butler County Sheriff's Office, to utilize a narcotics canine to check the **Subject Package**. Deputy Rhoades and his canine "Kaiser" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Ohio Office of the Attorney General. Sergeant Lange reports that "Kaiser" passed all of his examinations and has successfully located hidden drugs in the past; I therefore consider "Kaiser" to be reliable. Deputy Rhoades responded to the Oxford Post Office, where the **Subject Package** was placed in a controlled environment with several other similar packages and presented to "Kaiser", who alerted positively to the presence or odor of a controlled substance upon the **Subject Package**. Attached to this Affidavit, and incorporated by reference, is a photocopy of the

narcotic canine handler's record of examination.

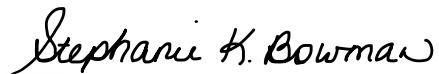
12. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Kaiser," is indicative of the **Subject Package** containing narcotics or proceeds relating thereof.
13. Based upon the information contained in this Affidavit, I believe that there is probable cause to believe that the **Subject Package** will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the **Subject Package** is requested.

Respectfully submitted,



Brad M. Dorman
U.S. Postal Inspector

Subscribed and sworn to and before me this 16 day of September, 2021.
via electronic means, specifically Facetime video.



Stephanie K. Bowman
United States Magistrate Judge





UNITED STATES POSTAL INSPECTION SERVICE
PITTSBURGH DIVISION

OFFICER AFFIDAVIT

I, Officer/Deputy D. Reynolds, am and have been employed by the Panther County Sheriff's Office since 2003. Among other duties, I am currently the assigned handler of narcotics detection canine "Vader" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Marijuana, Cocaine, Methamphetamine, and Heroin

On 9-16-21, at the request of Postal Inspector Doman, I responded to the 5145 Broad St., where "Vader" did alert to and indicate upon: [describe item]

USPS TRACLING 9405 S368 9523 ZS58 3765 91
TO: CAMERON MOORE FROM: BIRD ROCK COFFEE ROASTERS
5262 BROWN RD APT 101 5627 LA JOLLA BLVD
OXFORD OH 45056-9818 LA JOLLA CA 92037

Which, based upon my training and experience and that of "Vader", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

D. Reynolds
(Signature, Badge #, and Date)

9/16/21
(Witness/Date)